UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

| EDNA SELAN EPSTEIN, Individually and on) | Civil Action No. 6:14-cv-01606-MGL |
|--|------------------------------------|
| Behalf of All Others Similarly Situated,) | |
| | <u>CLASS ACTION</u> |
| Plaintiff, | |
|) | LEAD PLAINTIFF'S NOTICE OF MOTION |
| vs. | AND UNOPPOSED MOTION FOR |
|) | PRELIMINARY APPROVAL OF CLASS |
| WORLD ACCEPTANCE CORPORATION, et' | ACTION SETTLEMENT |
| al., | |
|) | |
| Defendants. | |
|) | |
|) | |

PLEASE TAKE NOTICE that Lead Plaintiff, Operating Engineers Construction Industry

and Miscellaneous Pension Fund, on behalf of itself and the Settlement Class, will move this Court,

at a date and time to be set by the Court, for an order, pursuant to Rule 23(e) of the Federal Rules

of Civil Procedure: (a) preliminarily approving the proposed class action settlement on the terms

set forth in the Stipulation of Settlement, dated August 24, 2017 ("Stipulation"); (b) certifying the

Settlement Class for settlement purposes; (c) approving the proposed methods of disseminating

notice to the Settlement Class; (d) setting a date for the final settlement hearing; and (e) such other

and further relief as this Court deems just and proper. Pursuant to Local Rule 7.02, counsel for

Lead Plaintiff certifies that they have consulted with Defendants' counsel and that there is no

objection to this motion.

This motion is based on the Stipulation and related settlement exhibits; the accompanying

memorandum of law in support thereof; all of the prior pleadings in this Litigation; and such

additional evidence or argument as may be presented to or required by the Court.

A proposed Order Preliminarily Approving Settlement and Providing for Notice is also

submitted herewith.

DATED: August 25, 2017

Respectfully submitted,

MOTLEY RICE LLC

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MARLON E. KIMPSON (D.S.C. Bar No. 7487)

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